

REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

-FILED-
JUN 26 2024
At Chanda J. Berta, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA)	INDICTMENT
)	
v.)	Cause No. 1:24-CR-22
)	Violation: 18 U.S.C. §§
)	2252A(a)(2)(A) and
CHRISTOPHER KOOGLER)	2252A(a)(5)(B)

THE GRAND JURY CHARGES:

COUNT 1

On or about August 30, 2023, in the Northern District of Indiana,

CHRISTOPHER KOOGLER,

did knowingly distribute any child pornography, as defined in Title 18,
United States Code, Section 2256(8)(A), that has been mailed and shipped and
transported in and affecting interstate and foreign commerce by any means,
including by computer, and that has been shipped and transported using any
means and facility of interstate and foreign commerce;

All in violation of 18 U.S.C. § 2252A(a)(2)(A) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

On or about October 26, 2023, in the Northern District of Indiana,

CHRISTOPHER KOOGLER,

defendant herein, did knowingly possess material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that has been mailed and shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, including an image of child pornography involving a prepubescent minor and a minor who had not attained 12 years of age;

All in violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 and 2 of the Indictment are hereby realleged and incorporated by reference for purposes of alleging forfeitures pursuant to 18 U.S.C. § 2253.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252A, as alleged in Counts 1 and 2 of the Indictment, pursuant to 18 U.S.C. § 2253, **CHRISTOPHER KOOGLER**, shall forfeit to the United States of America:

- a. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- b. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

3. Upon conviction of any of the offenses set forth in this Indictment, the government will seek a money judgment in the amount of proceeds received for the defendant's participation in the alleged scheme.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 2253.

A TRUE BILL

/s/ Foreperson

Foreperson

CLIFFORD D. JOHNSON
UNITED STATES ATTORNEY

By: /s/ Lesley J. Miller Lowery
Lesley J. Miller Lowery
Assistant United States Attorney